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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION
4 DONNA CURLING, et al.,
5 Plaintiffs, CIVIL ACTION FILE
6 vs. NO. 1:17-cv-2989-AT
7 BRAD RAFFENSPERGER, et
8 al.,
9 Defendants.

10
11
12 DEPOSITION OF
13 MEGAN MISSETT
14 September 28, 2021
15 1:07 p.m.
16
17 TAKEN BY REMOTE VIDEO CONFERENCE
18 LaRita J. Cormier, RPR, CCR-2578
19
20
21
22
23
24
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MARILYN MARKS, Coalition for Good

Governance

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MATT RIESDORPH, Veritext Concierge

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1 P R O C E E D I N G S

2 THE REPORTER: Due to the need for this
3 deposition to take place remotely because of the
4 government's order for social distancing, the
5 parties will stipulate that the court reporter may
6 swear in the witness over the Veritext Virtual
7 Videoconference and that the witness has verified
8 that she is in fact Megan Missett.

9 MEGAN MISSETT,

10 having been first duly sworn, was examined and
11 testified as follows:

12 EXAMINATION

13 BY MS. LaROSS:

14 Q. Ms. Missett, I'm going to be asking you
15 some questions. I just want to make sure I'm
16 pronouncing your name correctly. Is Missett the
17 correct pronunciation?

18 A. Missett is perfect, but you might see that
19 I'm registered to vote as Margaret Missett. That's
20 the name on my birth certificate and the name I fly
21 and vote under, but everyone else calls me Megan.

22 Q. All right, great. I was going to clarify
23 that with you, and I appreciate that you did so.

24 So good afternoon, Ms. Missett.

25 MS. LaROSS: This will be the deposition of

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1 Mississippi. I think that's it.

2 Q. And are you from New Jersey?

3 A. Originally.

4 Q. Originally?

5 A. (The witness nods.)

6 Q. So are you from New Jersey originally?

7 A. Yes. I was born there and lived there
8 until I was a teenager.

9 Q. And then how long did you live in New York?

10 A. About ten years, to the best of my
11 recollection.

12 Q. So would that have been sometime when you
13 were a teenager, and then for ten years after that?
14 Is that correct?

15 A. Yeah.

16 Q. And then from New York, did you move to
17 Mississippi?

18 A. Yes.

19 Q. How long did you live in Mississippi?

20 A. Two years, approximately.

21 Q. And then from Mississippi, did you move to
22 Georgia?

23 A. Yes.

24 Q. And what year did you move to Georgia?

25 A. 1996.

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1 Q. So during the Olympics, I guess?

2 A. Right after the Olympics, yes.

3 Q. And since you moved to Georgia in 1996,
4 have you always resided in Fulton County?

5 A. Yes.

6 Q. Do you have any relatives that live in the
7 Atlanta area?

8 A. No, other than my immediate family, my
9 husband and children.

10 Q. And is your husband's last name Missett as
11 well?

12 A. No. It's Greenwald.

13 Q. And what are the last names of your
14 children?

15 A. Greenwald.

16 Q. Any other relatives north of Atlanta?

17 A. No.

18 Q. Have you ever given a deposition before?

19 A. No.

20 Q. Have you ever testified in court before?

21 A. No.

22 Q. Have you ever testified in the Georgia
23 legislature?

24 A. Yes.

25 Q. And when did you testify in the Georgia

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1 legislature?

2 A. I don't recall the date.

3 Q. What was -- well, let me ask this: How
4 many times have you testified in the Georgia
5 legislature?

6 A. I don't actually know the number, but it
7 was always in regard to something to do with voting,
8 voting legislation.

9 Q. So it was -- you testified more than once
10 you can say?

11 A. I believe so.

12 Q. Okay. And was it, you know, more than ten
13 times, or was it --

14 A. No. Less than ten times. Can you tell me
15 what is defined as testifying before the
16 legislature?

17 Q. Sure.

18 A. We've had smaller meetings, but you know.

19 Q. Okay, sure. So it would be -- well, let me
20 ask it this way. So what about at a hearing that's
21 held in the Georgia legislature?

22 A. Uh-huh.

23 Q. So is that the circumstance that you have
24 been referring to for your testimony before the
25 Georgia legislature?

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1 A. Yes, I've done that.

2 Q. Okay. And then was there any other kind of
3 testimony that you gave in the legislature?

4 A. I'm trying to recall whether I testified at
5 any of the citizen participation opportunities; but
6 again, I'm not sure if that would qualify, which is
7 a state committee.

8 Q. Okay. So what -- what committees have you
9 testified at hearings?

10 A. Ooh, that's a good question. Any of the
11 committees that were involved in voting legislation.

12 Q. And when did you testify?

13 A. I don't recall.

14 Q. Would it have -- and what were the issues
15 that you testified about?

16 A. Electronic voting systems; wanting, you
17 know, hand-marked paper ballots; issues with, you
18 know, fair voting, voter suppression.

19 Q. So would you say that the occasions that
20 you testified in front of a Georgia legislative
21 committee has been within the last ten years?

22 A. Yes.

23 Q. And your testimony, did it concern DREs or
24 voting machines, direct recording devices?

25 A. Yeah, DREs.

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1 interested in voting or other -- other things or
2 lobbying their legislators.

3 Q. Did you speak with any particular
4 legislators?

5 A. Not at the capitol.

6 Q. And have you spoken with legislators
7 anywhere other than the capitol?

8 A. Informally, and sometimes by e-mail or --
9 yeah.

10 Q. And what topics did you speak informally to
11 the legislators?

12 A. Usually things that concern me about
13 voting.

14 Q. And what are those concerns that you
15 addressed with legislators?

16 A. What are my concerns about voting?

17 Q. Yeah, that you addressed with the
18 legislators that you've just referred to.

19 A. I have concerns about the trustworthiness
20 of the electronic voting system in Georgia, and I
21 also have issues with -- with some systematic bias
22 and access to the ballot.

23 Q. So describe what your issues and concerns
24 are pertaining to trustworthiness.

25 A. Oh. You mean with electronic voting

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1 A. Okay.

2 Q. And so after high school, describe for me
3 your education.

4 A. Sure. I left high school my senior year
5 and got a GED while attending Monmouth College,
6 which is in New Jersey, now called Monmouth
7 University. Then I transferred to Sarah Lawrence
8 College, graduated in 1986. That sound right? Yes,
9 1986. And spent a year working, and then went to
10 graduate school in clinical psych at St. John's
11 University in New York, and I got my Ph.D. in 1992
12 is when it was completed.

13 Q. Okay. So your study with the -- in New
14 Jersey, did you receive a degree from that
15 university as a result of your study there?

16 A. Monmouth University?

17 Q. Yes.

18 A. No, because I transferred to Sarah Lawrence
19 and I got my degree from Sarah Lawrence.

20 Q. And your study at Monmouth, what topic
21 areas or major did you have?

22 A. It was psychology. When I got to Sarah
23 Lawrence, it was psychology with a minor in
24 genetics.

25 Q. And what degree did you receive from the

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1 A. No.

2 Q. I'm going to ask you a few more questions
3 concerning your education. Have you had any formal
4 education concerning voting or elections?

5 A. No.

6 Q. Sorry, say that again?

7 A. No, I haven't had formal education in
8 voting or elections.

9 Q. Any formal education or training in Georgia
10 election law?

11 A. No, I haven't had formal training.

12 Q. Any formal education or training in Georgia
13 election administration or administration procedures
14 in Georgia?

15 A. No formal training.

16 Q. Have you ever worked at a polling place?

17 A. Yes, I have worked at a polling place.

18 Q. And what jobs have you done at polling
19 places?

20 A. Observation, which is one of the things I
21 didn't refresh my memory dates about, so I would
22 have to go back to see, you know, where and when it
23 was.

24 Q. How many occasions did you work in a
25 polling place?

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1 A. At least three, but I can't be precise.

2 Q. And was that at the same precinct, or what
3 precinct did you work at?

4 A. Once was in DeKalb, twice it was in DeKalb.
5 I'd really have to go back and refresh myself. I
6 don't remember the most recent place where it was.

7 Q. Okay. So it may or may not have been
8 DeKalb?

9 A. No, I definitely did some poll watching in
10 DeKalb and Pleasantdale.

11 Q. And the work that you recall doing in
12 DeKalb, what was your function at the polling place?

13 A. The first time, I was doing it on behalf of
14 the Ossoff campaign, so I was helping voters who
15 were confused and, you know, making sure everything
16 was okay.

17 Q. When you say helping voters who were
18 confused, what do you mean by that?

19 A. If anyone had a problem or looked upset or
20 left the polling place because they were turned
21 away, we could provide any help.

22 Q. What kind of help did you provide?

23 A. That didn't -- that didn't happen in
24 Pleasantdale. It was very smooth.

25 Q. And the other occasions that you worked at

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1 was that --

2 A. I don't recall.

3 Q. -- do you recall?

4 A. (The witness shakes head.)

5 Q. So would it have been in Fulton County, do
6 you think?

7 A. I'm not sure.

8 Q. And what had you being there? You said the
9 first time you went and it was part of the Ossoff
10 campaign?

11 A. Correct.

12 Q. So what occasioned you to be at the polling
13 place that you just described?

14 A. It was probably through one of CGG's, you
15 know, citizen engagement efforts.

16 Q. And CGG, what does that stand for?

17 A. Coalition for Good Governance.

18 Q. And on that occasion, did you observe
19 anyone who had a problem using the ballot marking
20 device?

21 A. I don't believe so, to the best of my
22 recollection. I came in towards the end of voting,
23 and there's more those little -- you know, the
24 workers were just unfamiliar, understandably, with
25 the new equipment.

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1 things that the Coalition for Good Governance was
2 involved in as well.

3 Q. What was the purpose of taking photographs
4 of the poll tapes?

5 A. Well, with the DREs, you get a printout
6 from each machine so you can see, you have
7 photographic evidence of what happened with that
8 machine. So sometimes when you see anomalous, you
9 know, results when the results come in, you can go
10 and see what happened at the precinct, was there
11 something funny with one of the machines, was there,
12 you know, statistically crazy things. And a lot of
13 people like to take these so that they can get their
14 own count on election nights. That's one thing you
15 can do. But the other thing is you can analyze the
16 tapes to see some of the machine behavior. It's
17 different with the BMDs.

18 Q. So the photographing the poll tapes, was
19 that when we were using DREs?

20 A. Yes; it continued through using BMDs. And
21 at this point, there are many other organizations
22 involved as well.

23 Q. What other organizations?

24 A. So, so many. It's pretty -- even county
25 committees and, you know, at this point people have

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1 Q. Would it have been closer to a couple, or
2 would it be closer to ten?

3 A. I would say closer to five.

4 Q. So approximately five occasions of
5 photographing poll taping; is that correct?

6 A. Yeah, at least.

7 Q. Sorry, did you just say at least?

8 A. Yes. I don't recall how many times
9 exactly, but...

10 Q. And where did you do the photographing of
11 poll taping?

12 A. Me personally, usually in Fulton County,
13 DeKalb, and then later in Southwest Georgia.

14 Q. And where in Southwest Georgia?

15 A. Dougherty County, Randolph County, Terrell
16 County, places where it was difficult to get people
17 to do it.

18 Q. And which elections did you photograph poll
19 taping?

20 A. I don't recall exactly which elections,
21 but, you know, general primary, I -- I did it for
22 the last -- the runoff and the general.

23 Q. When you say last runoff, that would have
24 been earlier this year in 2021; correct?

25 A. Right.

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1 Q. And for the runoff, was that when you went
2 down to the various counties in South Georgia? Is
3 that --

4 A. Yes. Also for the general.

5 Q. And on those occasions, were you there on
6 behalf of the Coalition?

7 A. The first few times we did that, the
8 Coalition was really the only organization that was
9 advocating for that in Georgia, to the best of my
10 knowledge. But as time went on, it became a much
11 bigger affair. So the last time it was certainly --
12 it was providing data to the Coalition and to anyone
13 else who wanted the ideas and to share information
14 in an open way.

15 Q. Just a couple questions about your
16 education. Any training or education related to
17 computer hardware or programming?

18 A. Because of the time that I, you know, went
19 to school and got a Ph.D., I had to do FORTRAN and
20 Pascal and that stuff.

21 Q. How about any training or education related
22 to computer hardware that's involved in voting?

23 A. No.

24 Q. Any training or formal education in
25 cybersecurity?

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1 A. No.

2 Q. Any training or formal education concerning
3 voting equipment?

4 A. No.

5 Q. Any training or education related to
6 computer hacking or insertion of malware in a
7 computer system or voting machine?

8 A. No.

9 Q. Any training or education concerning the
10 operation of a DRE?

11 A. No.

12 Q. Any training or education concerning the
13 operation and functioning of BMDs?

14 A. No, not other than what is available to the
15 general public, no formal classes.

16 Q. Any training or education concerning the
17 operation or functioning of scanners used in
18 conjunction with ballot marking devices?

19 A. No.

20 MR. ICHTER: I missed that class too.

21 BY MS. LaROSS:

22 Q. Now have you ever voted on a DRE?

23 A. Yes.

24 Q. And have you ever voted on a BMD?

25 A. Yes.

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1 Q. And how many occasions have you voted on a
2 BMD?

3 A. March 2020, June 2020. To the best of my
4 recollection, those are the two times.

5 Q. And where did you vote on a BMD in March of
6 2020?

7 A. That was at Scotts Crossing library, an
8 early voting location.

9 Q. Did you have any trouble or difficulty
10 voting on a BMD on that occasion?

11 A. I didn't have trouble operating the BMD.
12 There were some issues with privacy, but operation
13 was fine.

14 Q. And the issues with privacy, what were
15 those issues?

16 A. The way the touchscreens are set up next to
17 each other in a line you have to go in the back and
18 pass everybody's screen to get to an empty voting
19 machine; and this was one of the earlier first times
20 they had used the BMDs, I think.

21 Q. Do you have any knowledge that anyone
22 breached your privacy while you were voting --

23 A. No.

24 Q. -- on the BMD?

25 A. I don't have any knowledge that anyone

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1 not involved in the preparation of the document.
2 She has no information about how it was prepared.
3 There's no foundation for this question. All she
4 has is a piece of paper that she saw for the first
5 time today in front of her.

6 MS. ELSON: The Curling plaintiffs will
7 join that objection and have a standing objection to
8 any others going forward.

9 BY MS. LaROSS:

10 Q. And so let me ask the question,
11 Ms. Missett: Do you have any reason to believe that
12 your vote did not count in March of 2020?

13 A. I don't feel I can be sure that it counted.

14 Q. Do you have any evidence that it did not
15 count?

16 A. No, I don't have evidence that it didn't
17 count.

18 Q. As to your vote cast on a ballot marking
19 device in June of 2020, do you have any evidence
20 that that vote did not count?

21 A. I don't have evidence that that vote didn't
22 count. I don't have direct evidence, no. I should
23 point out that you might not have noticed, but I
24 requested an absentee ballot at that -- during that
25 election from Fulton County, and it didn't arrive.

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1 And that's -- so that's why I think it shows a
2 request.

3 Q. And that was a request you made to Fulton
4 County for --

5 A. Yes.

6 Q. -- the absentee ballot?

7 A. Yeah. And I did follow up with them, and
8 they tried to get it to me, but they didn't end up
9 sending it in time, so I felt like I was the most
10 devoted person on the Friday on the last day of
11 voting.

12 Q. So you voted on the Friday during the last
13 day of early voting for that election in person?

14 A. Right, because I waited 'til the last
15 minute to see if I could get my absentee.

16 Q. And are you a member of the Coalition for
17 Good Governance?

18 A. Yes.

19 Q. Are you a member of any other voter rights
20 group?

21 A. Affiliated with many voting rights groups.

22 Q. So your affiliation with the other groups,
23 are you a member of the other groups?

24 A. You have to define "member." I mean, I
25 do --

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1 Q. Many organizations have certain
2 requirements of becoming a member, and you mentioned
3 that you are a member of the Georgia Coalition for
4 Good Governance, so I'm asking that kind of -- are
5 you a member similarly in other organizations?

6 A. Yes, similarly.

7 Q. Okay. And what are those organizations?

8 A. You know, support organizations like Black
9 Voters Matter and Common Cause and ACLU of Georgia.
10 I'm very -- you know, I amplify their work and I
11 sometimes attend meetings and I send out information
12 about the things that they're involved in.

13 Q. And you said something about that you
14 amplify their work. What does that mean?

15 A. On social media.

16 Q. So that would involve posting some of their
17 work on social media; correct?

18 A. Retweeting, make sure, you know, citizens
19 get engaged and know what's going on.

20 Q. And you work for the Georgia Coalition for
21 Good Governance. Did that -- have you held any
22 official positions with that Coalition for Good
23 Governance?

24 A. No.

25 Q. And when did you become a member of the

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1 plaintiff in this case?

2 A. I was asked by Marilyn Marks, who is the
3 director of Coalition for Good Governance.

4 Q. And what did she tell you about
5 participating as a plaintiff in this litigation?

6 A. If I recall, she -- I think the -- it was
7 a -- it's a lawsuit that was -- that was, you know,
8 reemerging, had been already in effect.

9 Q. Do you know when it was that you became a
10 plaintiff in this case?

11 A. It was February -- I can't remember if it
12 was 2017 or 2018. Do you have that information?

13 Q. Yes. It's my understanding that you became
14 a party to the lawsuit when the third amended
15 complaint was filed in 2018. Does that sound
16 correct?

17 A. February 2018, okay. Yeah. April 2018.

18 Q. And what was it that you were just checking
19 there to check the date?

20 A. I think it was dates I had jotted down.

21 Q. And what other items have you jotted down
22 on that list that you just referred to?

23 A. Just -- just dates and, you know, voting,
24 few dates.

25 Q. And have you referred to that document

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1 Q. Do you have any evidence that any of the
2 votes you cast in Georgia have ever been changed?

3 A. I don't have evidence if they've been
4 changed.

5 Q. Do you have any evidence that any DRE used
6 in an election here in Georgia was ever actually
7 hacked?

8 A. I wouldn't know. I wouldn't be able to
9 tell.

10 Q. Sorry, there was typing going on. I
11 couldn't quite hear your answer. Can you repeat
12 your answer, please?

13 A. Well, my understanding is the servers were
14 erased. But that is something that maybe could have
15 been ascertained, but I don't have evidence that my
16 votes were directly hacked. There is evidence that
17 there was a probe of the voting system.

18 Q. And then -- and what is that evidence?

19 A. Well, I didn't collect the evidence. I'm
20 not the FBI, but I think it's commonly known that
21 information is available.

22 Q. And what election was that related to, the
23 probe that you just talked about?

24 A. I believe it was 2016; but I'm, you know,
25 not an expert.

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1 Q. Did you have any evidence that any election
2 during 2016 was hacked?

3 A. Can you be more specific about hacked?

4 Q. Yes. Just that there was some intervention
5 into the computer system, that there was
6 irregularities that happened or that some -- some
7 outside group or individual was able to get into the
8 voting system.

9 A. There's evidence that there were issues
10 with poll books, but it's to my knowledge not
11 evidence as to who did that or why or whether it was
12 a glitch or intentional.

13 Q. Do you have any evidence that there was
14 malware inserted in any BMD during any election in
15 Georgia?

16 A. No. My concerns are over the possibility,
17 meaning that that could happen; but I don't have any
18 evidence that that happened to my vote.

19 Q. What about anyone else's vote? Do you have
20 any evidence that there was malware inserted in
21 connection with any votes in any election on a BMD
22 here in Georgia?

23 A. I can't really speak to that. I don't know
24 what steps were taken to ascertain if that happened.
25 But I don't have evidence that my vote was tampered

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1 with.

2 Q. Do you have any knowledge that any votes
3 that were cast in Georgia on a BMD, that there was
4 malware inserted in relation to those votes other
5 than your own? Do you have any evidence of any
6 other votes?

7 A. No, not of another vote, only the
8 possibility.

9 Q. They tell you that there's a possibility of
10 malware being inserted in voting machines in
11 Georgia, but do you have any evidence that any
12 vulnerabilities in the system, in the BMDs has
13 actually resulted in the insertion of malware?

14 A. No, I don't have any evidence about the
15 insertion of malware.

16 Q. And when you voted on the BMDs on the two
17 occasions that you've described, have the concerns
18 that you've talked about about the machines, have
19 they come to fruition, that you know of?

20 A. Like what -- no. Can you be more specific?

21 Q. Yeah. I just want to -- because I know you
22 mentioned that you had concerns about problems with
23 BMDs.

24 A. Uh-huh.

25 Q. And I'm asking you if you have any evidence

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1 that any of those concerns actually happened.

2 A. To my -- I would not be able to come to a
3 conclusion about that because they aren't -- they're
4 compromised, they're not auditable, so I can't say.

5 Q. So as you sit here today, you can't say
6 that there -- any of the problems that you're
7 concerned about with the BMDs have actually
8 happened?

9 A. I can't say whether they did or didn't.

10 Q. And do you have any plans to vote on BMDs
11 in the future?

12 A. I think I've finally given up on that. I
13 was a holdout, maybe foolishly, because I like to
14 vote in person. But for all the problems with
15 mail-in voting and how those votes are counted and
16 the chain of custody, it's still more recoverable
17 than voting on a BMD. It's a hand-marked paper
18 ballot.

19 Q. And then is it your testimony that it is
20 your plan in future elections here in Georgia to
21 vote by absentee ballot?

22 A. That's my tentative plan. The problem is
23 will I get my absentee in time, and also the mail in
24 Fulton and DeKalb has been really problematic. So
25 if there aren't drop boxes, I have to take that into

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1 consideration.

2 Q. But as long as all of those things happen
3 correctly, you'll be voting in the future by
4 absentee ballot; correct?

5 A. While there are BMDs, yeah.

6 Q. I'm going to introduce another exhibit. If
7 you would just give me a minute.

8 (Deposition Exhibit 3 marked)

9 BY MS. LaROSS:

10 Q. Go ahead and refresh on Exhibit Share,
11 Ms. Missett.

12 A. The document is 003?

13 Q. Correct, Exhibit 003.

14 A. Okay.

15 Q. Do you see that? Are you seeing that
16 exhibit, Ms. Missett?

17 A. Yes.

18 Q. Okay. And let me know when you've had a
19 chance to take a look at it.

20 A. Okay.

21 Q. And what is that document that you've just
22 reviewed that's been marked as Exhibit 003?

23 A. This is the Declaration of Megan Missett
24 which was filed 10/23/19.

25 Q. And is this your declaration?

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1 mean by "valid." Is that too much to ask? I mean,
2 if it's just too much to ask for you to define a
3 core concept in your question, let me know that. I
4 find that troubling, but tell me that because I'd
5 like that to be on the record.

6 MS. LaROSS: And I'd like it to be on the
7 record whether you're instructing her not to answer
8 the question.

9 MR. ICHTER: I'm asking you what do you
10 mean by the term "valid."

11 MS. LaROSS: Madam Court Reporter, could
12 you read back my last question, please?

13 (The reporter read the requested material.)

14 MS. LaROSS: Was there an answer.

15 (The reporter read the requested material.)

16 THE REPORTER: No. "Objection. What do
17 you mean by valid?"

18 MS. LaROSS: Okay. I'll withdraw the
19 question.

20 BY MS. LaROSS:

21 Q. Ms. Missett, do you have any evidence that
22 any component of the Georgia election system was
23 actually hacked prior to or during the elections
24 held on November 3rd, 2020?

25 A. I don't have any personal evidence that

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1 they were hacked.

2 Q. Do you have any evidence that any malware
3 was actually inserted into any component of the
4 Georgia election system prior to or during the
5 elections held on November 3rd, 2020?

6 A. No.

7 Q. Do you have any evidence that the results
8 of any election held in Georgia on November 3rd,
9 2020, were actually changed in any way?

10 A. I don't have any direct evidence.

11 Q. And let me ask that a little bit more
12 specifically. Do you have any evidence that the
13 results of any election held in Georgia on November
14 3rd, 2020, were actually changed in any way as a
15 result of hacking of or insertion of malware into
16 any component of the system?

17 A. You're asking me questions I can't answer
18 because BMDs aren't auditible, so I can't venture to
19 say that I have faith in the results when I don't
20 have evidence that they were hacked. I don't know,
21 and neither do you.

22 Q. Well, that's what my question is is if you
23 have evidence of actual hacking. And I understand
24 that question to be no. Is that correct?

25 A. (The witness nods.)

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1 Q. You'll have to answer verbally.

2 A. Yes.

3 Q. Okay. Thank you. Do you contend that the
4 Georgia election system malfunctioned in any way in
5 connection with the November 3rd, 2020 general
6 election?

7 A. Can you define that? Do you mean, you
8 know, machine breakdowns and that sort of thing?

9 Q. Yeah, or anything that would have resulted
10 in -- that would have resulted in any kind of a
11 problem with the machine.

12 A. Just things that were commonly reported in
13 the news or reported by voters on social media or, I
14 mean, there were many problems, but I don't have an
15 exhaustive list.

16 Q. So do you contend that the -- any component
17 of the Georgia election system did not function
18 properly during the November 3rd, 2020 general
19 election?

20 A. I have to give the same answer. I think
21 there was a lot of, you know, evidence and reporting
22 and documentation that there were things that went
23 wrong with the machines and the electronic system.

24 Q. Do you have any evidence --

25 A. I can't answer as an expert on --

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1 Q. Sorry, I didn't mean to interrupt you. Go
2 ahead.

3 A. Yeah. I can't answer as an expert or as a
4 journalist who was reporting and documenting all
5 those things.

6 Q. And I understand that you're not an expert,
7 and I'm just asking for your layperson's knowledge.
8 Do you have any evidence that any vote in the
9 presidential elections held on November 3rd, 2020,
10 in Georgia were actually switched from Donald Trump
11 to Joseph Biden as a result of a problem or anomaly
12 in the software used in the Georgia election system?

13 A. I don't know of any direct evidence that
14 that happened.

15 Q. Do you have any direct evidence that any
16 vote in the presidential election on November 3rd,
17 2020, was actually switched from Donald Trump to
18 Joseph Biden as a result of an algorithm or any
19 other design feature of the Georgia election system?

20 A. I don't have evidence that that happened.

21 Q. Do you have any evidence that any votes in
22 any other elections held in November of 2020 besides
23 the presidential election were actually switched
24 from one candidate to another as a result of a
25 problem with a component of the Georgia election

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1 system?

2 A. You know, I know people have given
3 depositions to that effect, but I don't know that
4 happened, so I don't have personal knowledge of that
5 happening to me or I can't give you dates and times.

6 Q. So I'm not sure I'm clear about your
7 answer. So do you have any direct evidence that
8 votes in elections other than the presidential
9 election in November of 2020 were switched from one
10 candidate to another?

11 A. I didn't, you know, take depositions. I'm
12 aware that people have reported that happening, but
13 I don't have direct evidence.

14 Q. Do you have any direct evidence that the
15 Georgia election system failed to count any legal
16 vote in the presidential election held on
17 November 3rd, 2020, in Georgia?

18 A. No.

19 Q. Do you have any evidence that the Georgia
20 election system counted any illegal votes in the
21 presidential election on November 3rd, 2020, in
22 Georgia?

23 A. I don't have evidence of that occurring.

24 Q. Sorry, I didn't hear your answer.

25 A. I don't have evidence of that occurring.

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1 problems have been disclosed or they, you know,
2 happen to hear about or know about it or whether,
3 you know, if they're talking to voting machine
4 vendors or security experts. But beyond the
5 feelings, I think everybody wondered, you know, if
6 their ballots can't be audited, if their ballots are
7 compromised.

8 Q. I'm going to ask you the question -- I'm
9 sorry, please go ahead.

10 A. They're potentially compromised.

11 Q. Okay. I'm going to ask you the same
12 questions about the BMDs. So how have you
13 personally been injured by the use of BMDs in
14 Georgia?

15 A. Well, I can't -- I continue to vote in
16 person, although I shouldn't have, knowing what I
17 know because, you know, I can't trust that my vote
18 is my vote on the BMDs, which means -- and the only
19 way in Georgia I can vote on a hand-marked paper
20 ballot is to vote absentee.

21 Q. And that's typically how you plan to vote
22 rather than using BMDs in Georgia; correct?

23 A. Yeah. As I said before, there are problems
24 with the absentees; but it is, you know,
25 recoverable, at least the ballot itself is not

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1 that clear to you?

2 A. Yes, thank you.

3 Q. All right. Ms. Missett, do you have any
4 direct evidence that the results of the runoff
5 elections that was held here in Georgia in January
6 2021, the results were changed in any way as a
7 result of hacking of or insertion of malware into
8 any component of the Georgia election system?

9 A. No.

10 Q. Did you have any reason for our -- let me
11 strike that. I'll start over.

12 Do you know of any reason that the results
13 from the presidential election in 2020 should be
14 challenged?

15 A. I don't have direct evidence that the
16 results were changed. I just, you know -- the
17 results aren't auditible, so I don't have faith in
18 the results.

19 Q. Do you have any direct evidence that the
20 results of the runoff that was held here in Georgia
21 in January of 2021 should be challenged?

22 A. No direct evidence.

23 Q. And let me ask you also, have you made any
24 payment to your attorneys in this case for their
25 services?

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1 CERTIFICATE

2 STATE OF GEORGIA:
3 COUNTY OF FULTON:

4 I hereby certify that the foregoing
5 transcript was taken down, as stated in the caption,
6 and the colloquies, questions and answers were
7 reduced to typewriting under my direction; that the
8 transcript is a true and correct record of the
evidence given upon said proceeding.

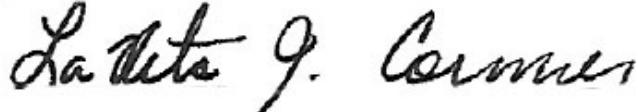
9 I further certify that I am not a relative
10 or employee or attorney of any party, nor am I
financially interested in the outcome of this
action.

11 I have no relationship of interest in this
matter which would disqualify me from maintaining my
12 obligation of impartiality in compliance with the
Code of Professional Ethics.

13 I have no direct contract with any party in
this action and my compensation is based solely on
the terms of my subcontractor agreement.

14 Nothing in the arrangements made for this
proceeding impacts my absolute commitment to serve
all parties as an impartial officer of the court.

15 This the -



16 _____
17 LaRita J. Cormier, RPR, CCR No. 2578
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